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Date: 9/11/02 9:38AM
Subject: SUMMARY OF PROBLEMS WITH REVISION OF SECTION 6.0

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Tom

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Summary of Problems with Entergy's
Application on Revision of Section 6.0
Arkansas Nuclear One, Unit 2

The staff has reviewed Entergy's ANO-2 Technical Specification (TS) amendment request of June 26, 2002, as supplemented by letter dated July 18, 2002, which supercedes and replaces the TS amendment request of January 31, 2002. In its review, the staff compared the June 26 and July 18, 2002, submittals to the latest revision of NUREG-1432 (Standard Technical Specifications (STS), Combustion Engineering Plants), the latest revision of the Arkansas Nuclear One, Unit 1 (ANO-1) Improved Technical Specifications (ITS), the original Current Technical Specifications (CTS) for ANO-1, the Discussion of Changes (DOCs) and Justification for Deviations (JFDs) used to convert the ANO-1 CTS to the ITS, and the staff's draft request for additional information (RAI) based on its review of the January 31, 2002, application. Our review is summarized as follows:

1. Of the 46 RAIs, the staff found that the June/July submittals provided sufficient information to resolve 24 of the RAIs. However, the submittals did not provide sufficient information to resolve the following RAIs:

| | | |
|---------|---------|--------|
| 1.0-1 | 3/4.8-1 | 6.0-19 |
| 1.0-2 | 6.0-1 | 6.0-20 |
| 3/4.3-1 | 6.0-8 | 6.0-22 |
| 3/4.3-3 | 6.0-10 | 6.0-26 |
| 3/4.3-4 | 6.0-13 | 6.0-29 |
| 3/4.7-2 | 6.0-15 | 6.0-30 |
| 3/4.7-3 | 6.0-16 | |
| 3/4.7-6 | 6.0-17 | |

2. The staff found that the markup of the ANO-2 CTS (2CTS) was incomplete. Changes were indicated in the CTS markup by underlining additions and striking out deletions. A number of the changes were not indicated as changes, particularly in the inserts (i.e., License Condition (LC) 2.C.(3)(p) to Proposed Technical Specification (PTS) 6.5.10, LC 2.C.(5) to PTS 6.5.2, 2CTS 4.6.1.2.d.2 to PTS 4.6.1.2.b.). If RAI 1.0-1 to the January 31, 2002, application had been responded to as intended (2CTS marked up like a conversion), most of these items would not have occurred.
3. A number of specifications involved more than one type of change (Administrative, More Restrictive or Less Restrictive). While the overriding change (i.e., More Restrictive or Less Restrictive) was discussed and a justification provided, the subservient changes (i.e., Administrative) were ignored and not discussed or justified (i.e., Administrative changes to 2CTS 6.3.1). This concern would have been resolved if RAI 1.0-1 had been responded to as intended, and with a DOC similar to 1CTS DOC A.1.
4. A number of changes were mis-classified, i.e., changes justified and classified as Administrative are actually More Restrictive changes. For example, the change to 2CTS/PTS 6.2.2.d is classified as an Administrative change, but it is really a Less Restrictive change.

5. The same change was proposed for a number of TSs. A description/justification section was provided for each TS, the change was discussed, and a justification for the change was provided in one section but not in the other sections. For example, the shutdown requirement for 2CTS 3.3.3.1, Table 3.3-6, Action 17 was justified but the shutdown requirement for Action 20 was not. This concern would have been resolved if RAI 1.0-1 had been responded to as intended.
6. A number of changes introduced new limits, surveillance frequencies, and allowed outage times (AOTs). Even though the overall change was described and classified, the justification as to why particular limits, frequencies and AOTs were chosen was not provided. For example, TS 3.8.1-1 has a new Action (Action f). Action f contains a number of limits and AOTs (i.e., 17,446 gallons and 48 hours). Partial or no justification is provided as to why these limits and AOTs were chosen and why they are acceptable for ANO-2.
7. A number of changes were based on approved Technical Specification Task Force changes to the STS (TSTFs); some TSTFs were referenced in the package and others were not. While it is permissible in a conversion to show an ITS deviation from the STS as a TSTF change without justifying the ITS deviation, an appropriate justification needs to be provided for the conversion of the CTS to the ITS. This was not done in the ANO-2 package. For example, the change in LC 2.C.(5) to change "refueling interval" to "18 months" is a TSTF-299 change, which was not justified.
8. The initial review of the June/July submittal indicated a lack of attention to details and an inadequate Quality Assurance Program. The following are some examples of this problem:
 - a. Attachment 1, page 49 of 56, Section 34.0, Second paragraph: It appears that this paragraph should be addressing the PTS, not the CTS.
 - b. Attachment 2, page 6-21, PTS 6.6.5: The reference for the moderator temperature coefficient should be TS 3.1.1.4, not 3.1.1.1 as shown in the marked-up TS pages, and not TS 3.1.1.2 as shown in the clean TS pages.
 - c. Attachment 2, page 6-21, PTS 6.6.5: The reference to TS 3.1.3.6 should be to the Regulating and Group P CEA Insertion Limits, not the Regulating CEA Insertion Limits.
 - d. Attachment 2, Insert 4, New PTS 6.5.13, Diesel Fuel Oil Testing Program: The total particulate concentration of the fuel oil should be tested every 92 days, not every 921 days.
 - e. Attachment 2, pages 6-14 and 6.14a, PTS 6.5.4 shows 10 subsections and a statement on SR 4.0.2/4.0.3 applicability. The same specification in Attachment 4, page 6-5 only shows 7 subsections and no SR 4.0.2/4.0.3 applicability statement.